



VIRGINIA
& AMBINDER LLP
A t t o r n e y s a t L a w

40 Broad Street, 7th Floor
New York, New York 10004
Telephone: (212) 943-9080
www.vandallp.com

Jack L. Newhouse Esq.
Partner
jnewhouse@vandallp.com

August 31, 2020

VIA ECF

Hon. Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Debora Bayne, et al. v. NAPW, Inc., et al.*
18-CV-3591 (MKB)(RER)

Dear Judge Reyes:

This firm represents Named Plaintiff Bayne, Opt-in Plaintiffs, and putative class members (collectively “Plaintiffs”) in the above referenced wage and hour litigation. I write jointly with Defendants’ Counsel pursuant to Your Honor’s July 30, 2020 Order, directing the parties to file a status report by August 31, 2020.

The parties are pursuing settlement, and to this end have exchanged communications regarding settlement and agreed to retain the services of a private mediator, Ruth D. Raisfeld. The parties have scheduled a mediation for November 16, 2020.

In light of the foregoing, the parties jointly respectfully request that the Court permit the parties to file a joint status report by November 20, 2020 to inform the court on the status of settlement and advise the Court on how the parties wish to proceed.

Thank you for your time and attention to this matter.

Respectfully Submitted,

/s/Jack L. Newhouse, Esq.

cc: All counsel of record (via ECF)